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July 28, 2022

By ECF

Honorable Analisa Torres United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v. Shea, S2 20 Cr. 412 (AT)

Uncontested Request for Limited Unsealing of Certain Trial Exhibits

Dear Judge Torres:

This firm represents non-party We Build the Wall, Inc., which was previously designated on the docket an "interested party" in these proceedings. I am writing with the consent of the government to request that the Court order the limited unsealing of certain trial exhibits in order to permit the government to furnish them to We Build the Wall, Inc. In particular, We Build the Wall seeks access to government exhibits 1000, 1200, 1500, and 1700, all of which contain We Built the Wall bank records. As noted above, the government consents to this limited unsealing.

Respectfully submitted,

Justin S. Weddle